

FEDERAL COMMUNICATIONS COMMISSION WASHINGTON

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 15, 1992

Ms. Debra Kaloyios Vice President B.D.A. Sales Inc. 2035 Victory Boulevard Staten Island, New York 10314

Dear Ms. Kaloyios:

Thank you for your letter about the FCC's billed party preference proposal.

As you know, in Common Carrier Docket No. 92-77, the FCC has proposed to adopt a simplified dialing plan, known as billed party preference, for access to operator services from public telephones. I appreciate your providing me with your views on the impact of this proposal on your business. Please be assured that I will take those views into account when the billed party preference proposal comes before the Commission for consideration.

In accordance with the Commission's rules, I am also placing a copy of your letter in the record in Docket 92-77.

Signerely yours,

Ervin S. Duggar Commissioner

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OFFICE OF THE SECRETARY

B.D.A. SALES INC. OFFI 2035 Victory Blvd. Staten Island, New York 10314 (718) 494-4330

June 18, 1992

The Honorable Alfred C. Sikes Chairman Federal Communications Commission 1919 M Street, NW Washington, DC 20554

Re: FCC Billed Party Preference

Dear Alfred C. Sikes,

Our company is a family owned and operated independent public payphone provider (also known as "customer-owned coin-operated telephones" or "COCOTs"). We buy, install and maintain sophisticated telephones dedicated to public use. Our telephones service customers located at convenience stores, truck stops, schools, shopping centers, etc. As an independent payphone provider we bare the entrepreneurial risk in the payphone business with no other base to subsidize our operations unlike New York Telephone who subsidizes their payphone operations with funds received from residential and business ratepayers.

We are writing to ask for your help in opposing a proposal being considered by the Federal Communications Commission in CC Docket 92-77. The proposal, referred to as "Billed Party Preference" (BPP), would change the way long distance carriers are selected on operator assisted calls, such as collect and calling card calls. BPP doesn't appear to offer consumers any additional benefits, but it will expand New York Telephone's control over telephone service while it limits our options. BPP would eliminate our ability to choose a primary operator service provider and effectively eliminate the commission we are paid on the operator assisted calls made from public phones. The revenue we receive from operator assisted calls has benefitted us and our customers. We provide better service, responsiveness, maintenance, and equipment because of the revenue we receive.

The BPP proposal to direct all 0+ calls to the local telephone companies would extend their local access monopoly in a way that would impede competition and innovation in payphone and operator services. Competitive payphone companies have responded to the public's needs with tailored offerings, introducing a series of new service innovations, and at the same time stimulating a greater availability of phones for the public (including areas in which New York Telephone chooses not to provide service because of high crime and vandalism).

We therefore, urge you to oppose this proposal and allow independent payphone providers to continue to receive revenue from operator assisted calls. If you have any questions or need further information concerning this matter, please feel free to call.

Sincerely,

Deha Kaloyios Vice President

cc: Commissioners James H. Quello, Sherrie P. Marshall, Ervin S. Duggan, Andrew C. Barrett. Gary Phillps.

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June 18, 1992

The Honorable Ervin S. Duggan Federal Communications Commission 1919 M Street, NW Washington, DC 20554

Re: FCC Billed Party Preference

Dear Ervin S. Duggan,

Enclosed please find a copy of our letter to The Honorable Alfred C. Sikes, Chairman of the Federal Communications Commission.

We are writing to ask for your help in opposing a proposal now being considered by the Federal Communications Commission in CC Docket 92-77. BPP doesn't offer consumers any additional benefits but would impede competition in the payphone industry.

If your have any questions please feel free to call.

Sincerely,

Debra Kaloyios

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